

IN RE:)	CHAPTER 13
JOE ARTHUR POWELL, JR.)	CASE NO: 315-09010
SSN: XXX-XX-7144)	JUDGE: CHARLES M WALKER
)	
Debtor(s).)	
Movant)	
)	
Vs.)	
WVMF FUNDING, LLC)	
AND STATEBRIDGE COMPANY)	
(SERVICER),)	
Respondents.)	
)	

Come(s) the Debtor(s), James Arthur Powell, Jr., through his attorney of record J. M. GEORGE & ASSOCIATES, and files his response to his mortgage creditor's, WVMF Funding, LLC and Statebridge Co. (servicer) to Debtor's Motion for Contempt and Show Cause:

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insurance and thereby cannot escape past acts of it's responsibilities to the Debtor. It's recourse may be against Rescap Liquidating Trust and serviced by LoanCare, LLC but Debtor asserts that it is not his responsibility in this case especially due to documents being accessible to each other.

5. Denies. Debtor asserts that WVMF Funding, LLC and Statebridge Co. (servicer), are the present holder of Debtor's mortgage and are obligated to not only collect the mortgage payments but apply them correctly as to mortgage escrow provisions including paying Debtor's mortgage insurance. By not applying the funds correctly, they are in violation of the automatic stay 11 USC § 362 and should be held liable.

WHEREFORE, based upon the foregoing premises, Debtor prays the Court will award against WVMF Funding, LLC (Debtor's mortgage company) and/or Statebridge Co. (mortgage servicer), all attorney fees and damages to the Debtor including a \$10,000 punitive damage award, the damage claim that his homeowners insurance could not pay and all other damages the Court deems appropriate in this action on behalf of the Debtor in violation of the Automatic Stay 11 U.S.C. § 362 and other pertinent Orders of the case.

Respectfully submitted,

J.M. GEORGE & ASSOCIATES

/S/ JAMES M. GEORGE

JAMES M. GEORGE, BPR #011822

Attorney for Debtor(s)

1451 Elm Hill Pike, Suite 205

Nashville, TN 37210

(615) 360-6200; Fax No: (615) 360-8822

Email: 1mmgeorge@comcast.net

EXHIBIT A**Claim 2 STATEBRIDGE COMPANY**

(Use CTRL-P to Print this Page)

00000
(000) 000-0000[Close Window](#)**Next Disbursement Info****CLAIM DETAIL**

Case Number 1509610
 Creditor STATEBRIDGE COMPANY
 Trustee's Claim Number 2
 Court's Claim Number 11
 Claim Type D - MTG-ON GOING
 MTG PYMT (S)
 Claim Filed Date Friday, January 13, 2017
 Mortgage Due Date Monday, October 01, 2018

CLAIM AMOUNTS

Claimed Amount \$0.00
 Scheduled Amount \$111,107.00
 Amount Paid Outside \$0.00
 Monthly Payment \$718.00
 Principal Owed \$0.00
 Principal Paid \$24,770.16
 Principal Due \$0.00
 Interest Rate 0.00
 Interest Paid \$0.00
 Interest Due \$0.00
 Collateral Value \$140,200.00
 Collateral Description
 Limit \$0.00
 Plan Code \$0.00
 Percent Allowed 100.00
 Months to Calculate 0.00

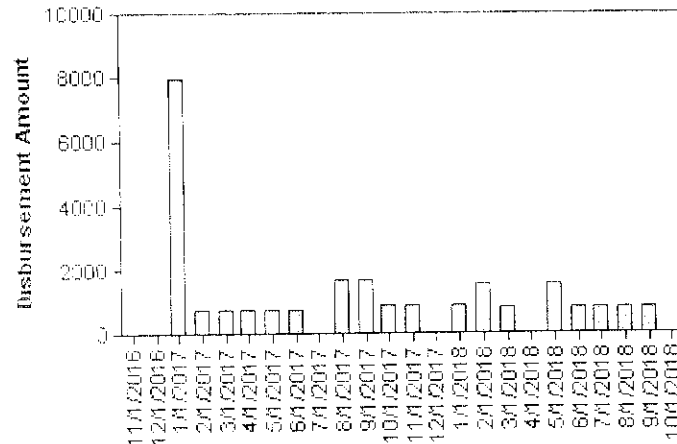
CLAIM FLAGS

Payee Level 21
 MTC CONT-2026
 ABINGDON DR-FILE
 A/PER A/O 12/20/16
 Comment CLAIM TO BE AMENDED
 W/IN 30 DAYS/OCWEN
 AMENDED
 Account Number xxx (xxxxxxxxxxxx)3971
No Cost
No Check
Delete
Reserve
Stop Disbursement
Continuing Continuing Debt
Special

CREDITOR INFORMATION

Creditor Name STATEBRIDGE COMPANY
 Address 1
 Address 2
 Address 3
 Zip Code 00000-0000
 Contact Name
 Phone Number (000) 000-0000
 Creditor Number
 ShortCut

Disbursements to this Claim

**PAYMENT HISTORY FOR CLAIM 2 - STATEBRIDGE COMPANY**

(Latest Payments First)

Insurance-

Prev.
Cred-

Disb Date	Check Number	Payee Name	Type	Amount
9/30/2018	3824917	STATEBRIDGE COMPANY	AMOUNTS DISBURSED TO CREDITOR	\$830.34
8/31/2018	3818164	STATEBRIDGE COMPANY	AMOUNTS DISBURSED TO CREDITOR	\$830.34
7/31/2018	3810943	STATEBRIDGE COMPANY	AMOUNTS DISBURSED TO CREDITOR	\$830.34
6/30/2018	3803784	STATEBRIDGE COMPANY	AMOUNTS DISBURSED TO CREDITOR	\$2,351.73
6/5/2018	3772827	LOANCARE LLC	CONTINUING DEBT/PAYMENTS CANCELLED TO PRINCIPAL	(\$1,567.82)
5/31/2018	3796559	STATEBRIDGE COMPANY	AMOUNTS DISBURSED TO CREDITOR	\$1,567.82
3/31/2018	3780048	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR	\$783.91
2/28/2018	3772827	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR	\$1,567.82
1/31/2018	3765890	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR	\$858.21
11/30/2017	3750504	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR	\$858.21
			AMOUNTS	

Additional Names and Addresses	Date of Last Change				
Payee: OCWEN LOAN SERVICING LLC •••••00000	12/30/2015	10/31/2017	3743302	LOANCARE LLC	DISBURSED TO CREDITOR \$858.21
LOANCARE LLC •••••00000	1/16/2017	9/30/2017	3735953	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR \$1,716.42
STATEBRIDGE COMPANY ••• •00000	5/3/2018	8/31/2017	3728561	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR \$1,698.39
LOANCARE LLC •••••00000	5/11/2018	6/30/2017	3713311	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR \$724.14
STATEBRIDGE COMPANY ••• •00000	5/11/2018	5/31/2017	3705439	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR \$724.14
OCWEN LOAN SERVICING LLC •••••00000	12/30/2015	4/30/2017	3697734	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR \$724.14
OCWEN LOAN SERVICING LLC •••••00000	12/30/2015	3/31/2017	3689970	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR \$724.14
LOANCARE LLC •••••00000	1/16/2017	2/28/2017	3682255	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR \$724.14
STATEBRIDGE COMPANY ••• •00000	5/3/2018	1/31/2017	3674802	LOANCARE LLC	AMOUNTS DISBURSED TO CREDITOR \$7,965.54
LOANCARE LLC •••••00000	5/11/2018				
STATEBRIDGE COMPANY ••• •00000	5/11/2018				
OCWEN LOAN SERVICING LLC •••••00000	12/30/2015				
JOHN ROAN •• ••00000	7/14/2016				
MACKIE WOLF ZIENTZ AND MANN ATTYS •• ••00000	10/27/2016				

Due Date Step Payments	
Start Date	Amount
3/1/2016	\$724.14
7/1/2017	\$1,698.39
8/1/2017	\$858.21
1/1/2018	\$783.91
7/1/2018	\$830.34

PAYEE NOTES

SC
JC

PAYEE FIELDS DESCRIPTIONS

No Cost A "Y" in this field indicates the system will not calculate trustee fees on disbursements to this claim.

No Check Code which indicates the claim should not be paid or will limit the amount the claim is paid. The valid options are as follows:

- 0 Indicates claim is to be paid outside

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EXHIBIT B

**Roofing Services & Solutions[®]**
Nashville Roofing & Sheet Metal Division

October 8, 2018

Joe Powell
Residence located at:
2026 Abingdon Dr
LaVergne, TN

Mr. Powell:

This proposal is for the reroof of your house in LaVergne, TN. Our scope of work will be as follows:

"Tear off existing 3-tab shingle roof and install new shingle roof"

1. We will tear off existing roof system down to the wood decking and dispose of off-site.
2. We will remove all sealant and metal flashings around dormers.
3. We will verify wood decking and replace as needed (see add/alternate).
4. Once deck is verified, we will attach Ice and Water shield around entire perimeter and in valleys and ridges, as required by NRCA standards.
5. We will then mechanically attach 30# felt to entire area of decking.
6. We will mechanically attach starter shingles and begin shingling roof area.
7. We will install new ridge vent and ridge cap shingles for appropriate ventilation.
8. We will install new pipe boots and new box vents where currently located.
9. At dormers, we will install counterflashing on all sides and seal appropriately.
10. Existing gutters and downspouts to remain

The proposed price to complete the above-mentioned scope of work will be \$16,000.00.

***Add/Alternate Pricing**

- The deck throughout the roof looks to be structurally sound, but some areas may need to be replaced for safety and warranty purposes. Removal and replacement of bad decking will be \$6.01 per square foot and will only be done as needed. We will provide documentation for any sections to be repaired or replaced.

We appreciate the opportunity to provide this quote and hope we may be of service. If there are any questions regarding this proposal, please feel free to contact me.

Thanks,

Justin Wheatley
R.S.S. Roofing Services and Solutions
jwheatley@roofingsands.com cell # 615-513-7981

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2018, a true and correct copy of the foregoing was emailed via Bankruptcy Court to Bret J. Chaness, Attorney for Statebridge Co. at bchaness@rubinlublin.com; the U.S. Trustee at ustpreion08.na.ecf@usdoj.gov and the Chapter 13 Trustee at hhecf@ch13nsh.com. A copy of same was mailed first class, postage prepaid to:

Statebridge Co.
5680 Greenwood Plaza Blvd.
Suite 100 S
Greenwood Village, CO 80111

WVMF Funding, LLC
5680 Greenwood Plaza Blvd.
Suite 100 S
Greenwood Village, CO 80111

Bret J. Chaness, Attorney
Rubin Lublin TN, PLLC
3145 Avalon Ridge Place, Suite 100
Peachtree Corners,, GA 30071

and to the Debtor(s).

/S/ JAMES M. GEORGE
JAMES M. GEORGE

MAILINGS: 4